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UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WASHINGTON

In Re:

Case No. 17-03545-FPC11

ROGER A. STADTMUELLER,

Debtor in Possession.

MOTION TO USE PROPERTY  
OF THE ESTATE and MOTION  
TO SHORTEN TIME WITH  
NOTICE - 11 U.S.C. § 363(b)

Debtor Roger A. Stadtmueller, by and through his attorneys, Winston & Cashatt, Lawyers, by Timothy R. Fischer, hereby moves pursuant to 11 U.S.C. § 363(b) for an order to use property of the estate outside the ordinary course of business. Debtor further moves this Court for an accelerated response period of eight (8) days, plus three (3) days for mailing, under LR 9013-1.

**A. USE OF PROPERTY OF THE ESTATE**

As part of the process to sell the real property located on Strong Road, the Debtor's real estate agent believes it necessary to make certain minor repairs to the real property so that it can be sold for maximum value and in an expedited

1 way. [Decl. of Realtor in Support]. The realtor believes there is approximately  
2 \$10,000 to \$15,000 of repairs needed. The Debtor and his realtor have identified  
3 repairs that are only absolutely necessary and recommended so that it can go onto  
4 the market in early April.  
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7 The Debtor respectfully requests that the Court enter an order allowing the  
8 Debtor to use up to \$15,000 in estate assets to improve the property for sale.  
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12 **B. SHORTENED TIME**

13 Due to the fact that the Debtor must begin repairs as soon as possible so that  
14 the house can get on the market by early April, the Debtor further moves this  
15 Court for an accelerated response period of eight (8) days, plus three (3) days for  
16 mailing, under LR 9013-1.  
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21 DATED this 5th day of March, 2018.  
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23 WINSTON & CASHATT, LAWYERS

24 /s/ Timothy R. Fischer  
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27 Timothy R. Fischer, WSBA No. 40075  
28 Attorney for Debtor in Possession  
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1 NOTICE

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3 **PLEASE TAKE NOTICE** that the debtor has filed with the Court a  
4 motion to sell property of the bankruptcy estate as well as a motion to shorten the  
5 response period. **Any person or party in interest objecting to the motions**  
6 **must do so by filing a written objection with the Clerk of the US Bankruptcy**  
7 **Court, P.O. Box 2164, Spokane, WA 99210, no later than eight (8) days, plus**  
8 **three (3) days for mailing, from the date of this notice.** If no objection is  
9 timely filed, an order may be presented to the Court for approval, ex-parte,  
10 without further notice.  
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16 DATED this 5th day of March, 2018.

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18 WINSTON & CASHATT, LAWYERS

19 /s/ Timothy R. Fischer

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23 Timothy R. Fischer, WSBA No. 40075  
24 Attorney for Debtor in Possession  
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